**BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

POSTAL RATE AND FEE CHANGES   **Docket No. R2006-1**

**Major Mailers Association's
Follow Up Interrogatories and Document Production Requests To
United States Postal Service Witness John P. Kelley (MMA/USPS-T30-31)
(August 2, 2006)**

Pursuant to Rules 25 and 26 of the Commission's Rules of Practice, Major Mailers Association submits the following interrogatories and document production requests to United States Postal Service Witness John P. Kelley (MMA/USPS-T30-31).

Respectfully submitted,

Major Mailers Association

By: _____

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**Dated: Middleburg, Virginia
August 2, 2006**

MMA/USPS-T30-31

Please refer to your response to Interrogatory MMA/USPS-T30-28 where you confirm your previous computations regarding the removal of collection costs for First-Class single piece letters. Please review the computations provided in the table below and confirm that the resulting test year unit costs for First-Class single piece, Nonautomation and Automation letters have been correctly derived with and without collection costs and per originating piece and per delivered piece. If you cannot confirm that these computations reflect your delivery cost results, please explain why and provide corrected computations.

	(1)	(2)	(3)	(4)
First-Class Letter Category	RPW Volume (000)	City Carrier + Rural Carrier Delivered Volume (000)	Total Delivery Costs With Collection ($000)	Total Delivery Costs Without Collection ($000)
Single Piece	34,594,330	21,167,692	2,675,500	1,782,394
Nonautomation	1,715,306	1,536,874	80,558	80,558
Automation	45,767,558	41,006,672	1,896,595	1,896,595
Presorted	47,482,864	42,543,546	1,977,153	1,977,153

TY Unit Costs
(Cents)

	(5)	(6)	(7)	(8)
First-Class Letter Category	Unit Delivery Cost With Collection Per Orig Piece	Unit Delivery Cost With Collection Per Delivered Piece	Unit Delivery Cost Without Collection Per Orig Piece	Unit Delivery Cost Without Collection Per Delivered Piece
Computation	(3) / (1) * 100	(3) / (2) * 100	(4) / (1) * 100	(4) / (2) * 100
Single Piece	7.734	12.640	5.152	8.420
Nonautomation	4.696	5.242	4.696	5.242
Automation	4.144	4.625	4.144	4.625
Presorted	4.164	4.647	4.164	4.647

Sources:
- (1) USPS-LR-L-67, UDCModel.USPS.xls, p. 2
- (2) MMA/USPS-T30-19, MMA.19.attach, p. UDCMMA19
- (3) USPS-LR-L-67, UDCModel.USPS.xls, p. 2
- (4) S.P.: MMA/USPS-T30-28, MMA.13.rewrite.collect.xls
  Nonauto and Auto: Col (3)

Please include in your response the derivation of, and sources for, any corrected computations